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Attorneys for Defendants Northern Leasing Systems, Inc., Jay Cohen, Rich Hahn, and Sara Krieger

NOTICE OF MOTIONS IN LIMINE

PLEASE TAKE NOTICE THAT upon the accompanying declaration of Robert D. Lillienstein, Esq., dated November 8, 2010, together with the exhibits annexed thereto, and the accompanying Memorandum of Law, and upon the pleadings and prior proceedings had herein, Defendants Northern Leasing Systems, Inc., Jay Cohen, Rich Hahn, and Sara Krieger (the "Defendants"), hereby move this Court, before the Honorable James S. Gwin, United States District Court, Carl B. Stokes United States Court House, 801 West Superior Avenue, Cleveland, Ohio 44113-1838, for an order or

orders, pursuant to Fed. R. Evid. 401, 402, 403, 404(b), 602, 802 and 1002, and Fed. R. Civ. P. 37, precluding Plaintiffs Melinda Serin ("Serin"), Judson Russ ("Russ"), Long Soui Lim ("Lim"), Gordon Redner ("Redner"), Peri Kettler ("Kettler") and Thomas J. Smith ("Smith") from introducing certain evidence at trial, and for such further relief as this Court deems just and proper.

Dated: November 8, 2010 New York, New York

MOSES & SINGER LLP Attorneys for Defendants

By: /s/
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